LAURA E. DUFFY United States Attorney FILED MARK W. PLETCHER Assistant U.S. Attorney Colorado Bar No.: 34615 DEC - 3 2013 ROBERT S. HUIE Assistant U.S. Attorney California Bar No.: 237374 880 Front Street, Room 6293 San Diego, CA 92101 Tel: (619) 546-9714 Email: mark.pletcher@usdoj.gov 9 JEFFREY KNOX 10 Chief, Fraud Section 11 CATHERINE VOTAW Trial Attorney, Fraud Section 12 Pennsylvania Bar No.: 34823 13 BRIAN YOUNG Trial Attorney, Fraud Section 14 Criminal Division 15 Ohio Bar No.: 0078395 Tel: (202) 353-0449 16 Email: Cathy.Votaw2@usdoj.gov 17 Attorneys for the United States 18 19 UNITED STATES DISTRICT COURT 20 SOUTHERN DISTRICT OF CALIFORNIA 18UL4287- JLS 21 UNITED STATES OF AMERICA, 22 23 Plaintiff, INFORMATION 24 Title 18, U.S.C., Sec. 371 – Conspiracy to v. 25 Commit Bribery LEONARD GLENN FRANCIS (1), 26 and JOSE LUIS SANCHEZ (2), 27 Defendants. 28

28 Ⅱ

//

The United States charges that, at all times relevant to this Information:

- 1. Defendant LEONARD GLENN FRANCIS was a citizen of Malaysia, residing in Singapore. FRANCIS was the Chief Executive Officer and President of Glenn Defense Marine (Asia) ("GDMA"), a corporation organized under the laws of Singapore, which provided "husbanding" services under contracts with the U.S. Navy to support the Navy's operations in the Pacific Ocean. "Husbanding" involves the coordinating, scheduling, and direct and indirect procurement of items and services required by ships and submarines when they arrive at port.
- 2. Defendant JOSE LUIS SANCHEZ is a Commander with the U.S. Navy. SANCHEZ served in Japan and Singapore from at least in or about April 2006 through in or about April 2013, supporting the U.S. Navy's operations in the Far East in the following capacities: from in or about April 2006 to in or about April 2008, as the Deputy Logistics Officer for the Commander of the U.S. Seventh Fleet; from in or about April 2008 through in or about May 2012, as the Director of Operations for the Fleet Logistics Command in Singapore; and from in or about May 2012 until in or about April 2013, as the Executive Officer for the Commanding Officer at the Fleet Logistics Command in Yokosuka, Japan. Since in or about April 2013, he has been assigned to the U.S. Central Command in Florida.
- 3. As an officer in the U.S. Navy, SANCHEZ was a "public official" as defined in 18 U.S.C. § 201(a). It was a violation of his official and lawful duties to transmit information that the U.S. Navy had classified as "Confidential" or "Secret" to any person not entitled to receive it, and to make unauthorized disclosures of proprietary, internal U.S. Navy information.
- 4. This crime having been committed on the high seas and outside any particular district, FRANCIS was arrested in the Southern District of California for his role in the offense charged in this Information.

THE CONSPIRACY

5. Beginning in or about January 2009, continuing to in or about February 2013, on the high seas and outside any particular district, defendants FRANCIS and SANCHEZ knowingly conspired to commit bribery, in violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C), and (b)(2)(A) and (C).

OBJECT OF THE CONSPIRACY

6. It was the object of the conspiracy for FRANCIS to offer and provide things of value to or on behalf of SANCHEZ, including travel expenses, entertainment, and prostitutes, in return for SANCHEZ providing classified and other internal U.S. Navy information to FRANCIS, and being influenced in the performance of his official acts.

METHODS AND MEANS OF THE CONSPIRACY

- 7. In furtherance of this conspiracy, and to accomplish its object, the following methods and means were used, among others:
- a. FRANCIS would give, offer, and promise things of value to or on behalf of SANCHEZ, including travel expenses, entertainment, and prostitutes.
- b. SANCHEZ would demand, seek, receive, accept and agree to receive and accept these things of value from FRANCIS.
- c. In exchange for things of value, SANCHEZ would provide FRANCIS with classified and other internal U.S. Navy information, advise FRANCIS on how to address concerns that the U.S. Navy had raised about GDMA's husbanding services and invoices, and make recommendations and use his influence with the U.S. Navy to benefit FRANCIS and GDMA.

OVERT ACTS

- 8. In furtherance of the conspiracy and to effect its object, the following overt acts, among others, were committed:
- a. In or about August 2011, FRANCIS paid for a prostitute for SANCHEZ in Manila, Philippines.

b. On or about May 23, 2011, SANCHEZ emailed FRANCIS 22 pages of internal U.S. Navy ship movement schedules for the following three months, which he was not authorized to disclose to FRANCIS.

All in violation of Title 18, United States Code, Section 371.

FORFEITURE ALLEGATIONS

9. The allegations set forth in paragraphs 1 through 8 of this Information are incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461(c).

// 10 // 11 // 12 // 13 // 14 // 15 // 16 $/\!/$ 17

 $/\!/$

//

//

1

2

3

4

5

6

7

8

9

18

19

20

21 // 22 // 23 //

24 // 25 // 26 //

27 // 28 //

10. Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given to the above-named defendants that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 981(a)(1)(c), and Title 28, United States Code, Section 2461(c), including but not limited to all property, real or personal, which constitutes or is derived from proceeds traceable to bribes or a bribery conspiracy, as alleged in this Information.

DATED: December³, 2013.

LAURA E. DUFFY United States Attorney

By: MARK W. PLETCHER
ROBERT S. HUIE
Assistant U.S. Attorneys

JEFFREY H. KNOX Chief, Fraud Section Criminal Division

By: Robert the for

CATHERINE VOTAW
BRIAN YOUNG
Trial Attorneys
Fraud Section
U.S. Department of Justice